

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
EASTERN DIVISION**

JASON WILLIAMS,  
Plaintiff,  
v.  
AT&T MOBILITY, LLC,  
Defendant.

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Case No. 5:19-cv-00475-BO

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME FOR  
PLAINTIFF TO RESPOND TO  
DEFENDANT'S MOTION TO  
DISMISS**

Plaintiff Jason Williams ("Plaintiff") pursuant to Federal Rule of Civil Procedure 6(b) and Local Civil Rule 6.1, hereby moves this Court to extend its deadline to respond to Defendant AT&T's ("Defendant") Motion to Dismiss [Dkt. 14] by thirty (30) days, or until February 3, 2020. In support of this motion, Plaintiff states the following:

1. Plaintiff filed his Complaint on October 24, 2019, and Defendant received the summons and Complaint on or about October 30, 2019.
2. Counsel for Plaintiff and Defendant conferred, and Plaintiff's counsel consented to a 30-day extension for Defendant to respond to the Complaint.
3. Defendant filed a Motion to Dismiss on December 20, 2019.
4. Plaintiff's time to respond to the Motion to Dismiss has not yet expired. The current deadline for Defendant to respond is until January 3, 2020.
5. Notwithstanding due diligence and good faith efforts, Plaintiff reasonably requires a thirty-day extension of time, or through and until February 3, 2020 to review and draft an appropriate response to the Motion to Dismiss.
6. The undersigned counsel conferred with counsel for Defendant, who consented to the extension requested herein.
7. A proposed order is submitted with this motion.

WHEREFORE, Plaintiff respectfully prays that this Court grant its motion and order that the deadline by which Plaintiff must file its response to the Motion to Dismiss be extended to February 3, 2020.

Respectfully submitted this the 31<sup>st</sup> day of December, 2019.

/s/ Christopher N. LaVigne  
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*Local Civil Rule 83.1(d) Counsel for Plaintiff Jason Williams*

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, December 31, 2019, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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*Counsel for Defendant AT&T Mobility, LLC*

Dated: December 31, 2019

/s/ Terence S. Reynolds

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